



Objection Reviewing Officer  
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May 12, 2014

Subject: Objection to the Final Supplemental Environmental Impact Statement and Draft Record of Decision for the Blackfoot Travel Management Plan.

### Statement of Interest

**Montana High Divide Trails** is a partnership, formed by nine outdoor recreation and conservation clubs of Southwest Montana representing backcountry horsemen, mountain bikers, hikers, and conservationists, including: Helena Bicycle Club, Mile-High Back Country Horsemen, Wild Divide Chapter of the Montana Wilderness Association (MWA), Last Chance Back Country Horsemen, Great Divide Cycling Team, Helena Trail Riders, Prickly Pear Land Trust, and the Helena Outdoor Club.

Following a year of dialogue, review and debate, these nine groups came together in 2007 to create Montana High Divide Trails, a shared vision connecting quiet trails and wild public lands along the Continental Divide to people and their communities.

The Montana High Divide Trails Agreement submitted to then Regional Forester Tom Tidwell in September 2007 extends from the Anaconda-Pintler to the Scapegoat Wilderness, through the Lincoln Ranger District.

The Montana High Divide Trails Agreement is a carefully balanced package of collaborative recommendations for management of the following:

1. Continental Divide National Scenic Trail
2. Future Wilderness Areas and Additions

3. Non-Motorized Conservation Areas
4. Trails to link communities and improve public access to the Continental Divide National Scenic Trail.

The final Record of Decision (ROD) on Blackfoot Summer Travel Plan is pivotal to the core mission and unified goals of all nine groups of Montana High Divide Trails.

Montana High Divide Trails submitted unified scoping comments on Blackfoot Summer Travel in 2011 and on the Draft EIS in 2013.

**Montana Wilderness Association** (MWA) is one of nine member organizations of Montana High Divide Trails that submitted unified comments at each step including pre-scoping, scoping and draft EIS for Blackfoot Travel. The MWA, founded in 1958, is a non-profit membership organization that works with communities to protect Montana's wilderness heritage, quiet beauty and outdoor traditions, now and for future generations. MWA members have led field trips, participated in forest planning, travel planning, rehabilitation and trail maintenance and construction projects on the Lincoln Ranger District and Helena National Forest for decades. MWA members have participated actively in all aspects of Travel Planning for the Upper Blackfoot-Continental Divide on the Lincoln Ranger District since it was initiated in 2000.

MWA is particularly proud of its role in orchestrating a historic agreement among diverse winter recreation users covering the Lincoln Ranger District in 2005. MWA members have worked together with Lincoln snowmobilers to see this agreement incorporated at long last in the Blackfoot Winter Travel Plan signed by Supervisor William Avey in October 2013.

In 2012, Montana Wilderness Association formed CDT-Montana, the new non-profit partner with the U S Forest Service responsible for volunteer projects on the northern 1,000 miles of the Continental Divide National Scenic Trail between Yellowstone National Park and Canada, including the Lincoln Ranger District. MWA's CDT-Montana program has brought new partners, volunteers, enthusiasm and funding to the Helena National Forest to help complete and care for the Continental Divide National Scenic Trail. In that effort, we greatly appreciate our working partnership with the Lincoln Ranger District and Helena National Forest, Back Country Horsemen, mountain bikers, hikers, the Montana Youth Challenge Academy and National Smokejumpers Association.

The final ROD will make decisions of central importance to the mission, goals and decades of work and leadership by MWA members, affecting key wild lands and quiet trails, including the Continental Divide National Scenic Trail.

The Draft ROD improves significantly over the Draft, particularly in its treatment of the Continental Divide National Scenic Trail and Specimen Creek Roadless Conservation Area. We appreciate these improvements and hope to see an excellent final summer travel plan to match the caliber of the excellent Blackfoot Winter Travel Plan signed in October 2013. Montana Wilderness Association and Montana High Divide Trails submit four objections to the proposed ROD, offering remedies that would greatly improve the Final Decision.

## **Notice of Objection**

Pursuant to 36 CFR § 218, Subparts A and B, the Montana Wilderness Association and Montana High Divide Trails Association object to the Final Supplemental Environmental Impact Statement and proposed Blackfoot Travel Management Plan for proposed management in four specific areas (1) Continental Divide Scenic Trail from Lewis and Clark Pass to the Scapegoat Wilderness and (2) Off Road Vehicle (ORV) use on Gould-Helmville Trail #467 within Nevada Mountain R-1 Forest Plan Non-Motorized Management Area, (3) the adjoining Continental Divide National Scenic Trail from Celler Gulch to Trail #467, and (4) administration of the short access road to the Granite Butte Lookout.

Statement (“FSEIS”) and Draft Revised Record of Decision (“ROD”) for the Blackfoot Travel Plan (“Travel Plan”). The Responsible Official is the Forest Supervisor, William Avey. A legal notice was published in the Helena Independent Record on March 28, 2014. Parties with standing are permitted to file objections to the FSEIS and ROD within 45 days of the publication of the legal notice in the newspaper of record. Objections must be filed no later than May 12, 2014. Montana High Divide Trails (MHDT) and Montana Wilderness Association (MWA) have standing for reasons described above.

This objection, dated May 12, 2014, has been filed in a timely manner.

## **Statements of Concern**

The Blackfoot Travel Plan as proposed, will have significant impact on the Helena National Forest Plan objectives, goals, standards, and future forest planning and public land protection guaranteed by Executive Order 11644. The proposed decision also creates trail designations that are inconsistent with the Falls Creek Recommended Wilderness in the Lewis and Clark National Forest Plan and 2009 Continental Divide National Scenic Trail (CDNST) Comprehensive Plan. For these reasons, MHDT and MWA submit the following objections.

### **Objection 1: Amendment of the Nevada Mountain Forest Plan Non-Motorized Management Area R-1 to authorize off road vehicle traffic through Non-Motorized Management Area on Forest Trail #467 known as the “Gould-Helmville Trail.”**

The R-1 amendment is contrary forest plan direction because it reverses forest planning goals and objectives, makes significant changes in the future character of the non-motorized management area, and fails to uphold the Agency’s responsibility under EO 11644 to protect public land.

#### **A. Amendment of the Nevada Mountain Forest Plan Non-Motorized Management Area R1 is inconsistent with Helena National Forest Plan standards, goals, and objectives.**

Nevada Mountain Roadless Conservation Area (49,939 acres) is the Helena National Forest's largest roadless area on the Continental Divide south of the Crown of the Continent. Under the Helena National Forest Plan, a 12,000-acre core in the heart of the Nevada Mountain Roadless Conservation Area is designated as "Management Area R-1" with the direction to "provide a variety of semi-primitive and primitive non motorized recreation opportunities." The Plan also mandates "[m]otorized vehicles are not allowed in the management area." Management Area R-1, Helena National Forest Plan, USDA Forest Service, Helena National Forest, page R-1 III/24 (1986) (Hereinafter "Helena Forest Plan")

The proposed Decision includes amending the Helena Forest Plan and reducing the Nevada Mountain R-1 Non-Motorized Area to legalize off road vehicle (ORV) traffic on the Gould-Helmville Trail #467, including 6.2 miles of Trail within the R-1 Forest Plan Non-Motorized Management Area.

To accomplish this amendment, the Draft Record of Decision (ROD) proposes a "Finding of Non-Significance" with which MWA and MHDT disagree. In the proposed Decision, the Agency considered significance factors and made the following determinations:

[Factor 1] Actions that do not significantly alter the multiple-use goals and objectives for long-term land and resource management.

*This amendment is consistent with the goals and objectives of the Forest Plan, and will have no effect on multiple-use objectives for the long term.*

[Factor 2] Adjustments of management area boundaries of management prescriptions resulting from further on-site analysis when the adjustments do not cause significant changes in the multiple-use goals and objectives for long-term land and resource management.

*The amendment does not adjust management area boundaries or management prescriptions. (ROD page 41 emphasis added)*

MWA and MHDT disagree with the Forest Service's no significance finding on both factors. The proposed Decision *does* adjust the prescription of Nevada Mountain from "motorized vehicles are not allowed" to allow motor vehicles. The Agency's analysis under Factor 1 is also flawed for the reasons discussed below.

The amendment proposed is inconsistent with forest plan management objectives and goals and has lasting future implications for future forest planning. Long term land and resource management goals in the Helena Forest Plan begin with the following:

1. Provide a range of quality outdoor recreation opportunities within a forest environment that can be developed for visitor use and satisfaction.
2. Provide a range of quality recreation, including motorized and non-motorized opportunities, in an undeveloped forest environment.

[. . .]

Helena Forest Plan, p. II-1.



Plan objectives include the commitment to manage specific forest areas that will provide “primitive and semi-primitive recreation (non-motorized).” Non-motorized areas are specifically identified as Plan Objectives, beginning with Nevada Mountain. Forest Plan, Helena National Forest, Pages II-2-3, USDA Forest Service, April 1986

The 1986 Helena Forest Plan explains that “[t]hroughout the life of the plan approximately 79,200 acres of undeveloped area outside of wilderness will remain undeveloped and be managed for semi-primitive recreation and wildlife values.” Helena Forest Plan, Page II-3.

Nevada Mountain is listed first among the non-motorized management areas. The Nevada Mountain R-1 Non-Motorized Management Area (12,000 acres) is the largest of six such R-1 forest plan designations and comprises almost 35% of the all R-1 Non-Motorized Management Area acreage in the Helena Forest Plan. Management goals for Nevada Mountain include providing “a variety of semi-primitive and primitive non motorized recreation opportunities.” Proposed Decision, Appendix A, p. 3.

The Gould-Helmville Trail #467 is 14 miles long and runs the entire length of the largest highest west-east ridge in the Nevada Mountain Roadless Area. More than six (6.2) miles of trail #467 are within the R-1 Non- motorized Area. Under the proposed Decision, the wording in the Forest Plan would change Management Area R-1 in order to allow management of a motorized Gould-Helmville Trail #467. Proposed Decision Summary, S-6.

It would be a significant change to the forest plan to allow off ORVs to dominate the longest trail in the largest R-1 designation and wilderness candidate area. Managing the 12,000-acre Nevada Mountain R-1 Management Area to provide quality non-motorized recreation is an expressly stated Forest Plan Objective, necessary for meeting Forest Plan Goals #1 and #2.

The amendment is not an insignificant change and is directly contrary to forest plan management area direction for this area. The proposed boundary adjustment causes a significant change in the 12,000-acre Nevada Mountain R-1 Non-Motorized Management Area by authorizing the conversion of its longest trail from providing high-quality non-motorized recreation and solitude to a motorized track accommodating ORV traffic including four-wheel vehicles (up to 50 inches wide) that can carry multiple passengers. Such four-wheel motor vehicles were prohibited by the “40-inch Trail Rule”, 36 CFR 261.12 (e) from driving on national forest trails when the Helena Forest Plan was signed.

**B. Amendment of the Nevada Mountain Forest Plan Non-Motorized Management Area R1 will adversely affect Nevada Mountain Wilderness evaluation in the upcoming Forest Plan revision.**

The Forest Plan R-1 Non-Motorized Management Area (12,000 acres) is located in the heart of the 50,000-acre Nevada Mountain Roadless Conservation Area. MWA and 8 other groups of MHDT expressly stated our long-standing support for consideration of Nevada Mountain Roadless Conservation Area for recommended wilderness; including

the R-1 non-motorized management area and Trail #467. As part of the forest planning process, the Agency is directed:

In developing a proposed new plan or proposed plan revision, the responsible official shall; (v) identify and evaluate lands that may be suitable for inclusion in the wilderness national preservation system and determine whether to recommend any such lands for wilderness designation. 36 CFR 219.7(c)(2).

An initial step in forest planning involves the inventory and evaluation of areas suitable for wilderness recommendation. Land Management Planning Handbook. Wilderness Evaluation. FSH 1909.12.

The Helena National Forest is set to begin the forest plan revision process in 2015. The forest planning process will evaluate forest management areas for wilderness potential and recommend areas for wilderness. In the forest planning process, the travel management decisions made in this decision will be primary considerations for the early stages of Helena National Forest planning.

The Nevada Mountain Conservation Roadless Area is among the largest and most eligible for wilderness recommendation of roadless conservation areas within the Helena National Forest. It has been nominated and supported for wilderness by numerous Montana hunting, conservation, recreation groups for decades as well as elected officials including members of the Montana Congressional delegation.

Amending the Helena Forest Plan to authorize a permanent four-wheel vehicle track running 14 ridge top miles through the Nevada Mountain Roadless Conservation Area will significantly and adversely affect wildlife and its wilderness evaluation in pending forest plan revision. The northern roadless area, including the area traversed by Trail #467, provides a major west-east elk migration corridor across the Divide to wintering areas on the east slope of Canyon Creek. Recent research has also documented the presence of healthy wolverine populations and Grizzly bears use this large roadless area atop the Continental Divide.

This amendment and proposed decision will significantly and adversely effect evaluation of the overall wilderness suitability and qualities of the 50,000-acre Nevada Mountain proposed Wilderness. The amendment will be harmful to the viability, apparent naturalness, size and manageability, primitive character, solitude and other wilderness qualities of the Nevada Mountain Proposed Wilderness. The loss of wilderness qualities and reduced ranking resulting directly from the proposed Decision may be significant enough to affect outcomes of pending forest plan revision; affecting whether Nevada Mountain is recommended for wilderness.

By proposing amendment to the Helena National Forest Plan in order to allow motorized use of the Gould-Helmville trail, the USFS acknowledges the impact of motorized use on the forest plan, including the Nevada Mountain Roadless Conservation Area. By permitting the motorized use of Gould-Helmville, the USFS is undermining the purpose of Forest Plan R-1 Non-Motorized Management Area. Such an amendment, only months before forest plan revision is scheduled to begin, runs contrary to the National Forest Management Act and the Wilderness Act.

**C. Amendment of the Nevada Mountain Forest Plan Non-Motorized Management Area R1 is inconsistent with EO 11644.**

Executive Order 11644, Sec. 9 specifically mandates the Agency to consider special protection to public lands:

[T]he respective agency head shall, whenever he determines that the use of off-road vehicles will cause or is causing considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat or cultural or historic resources of particular areas or trails of the public lands, immediately close such areas or trails to the type of off-road vehicle causing such effects, until such time as he determines that such adverse effects have been eliminated and that measures have been implemented to prevent future recurrence.

[ . . . ]

Each respective agency head is authorized to adopt the policy that portions of the public lands within his jurisdiction shall be closed to use by off-road vehicles except those areas or trails which are suitable and specifically designated as open to such use pursuant to Section 3 of this Order. Exec. Order No. 11644, 37 FR 2877 (Feb. 8, 1972).

The USFS has ignored Executive Order 11644 in this aspect of the proposed Decision. Motorized use on the Gould-Helmville obviates the necessity of Agency management for areas significantly impacted by certain uses. The Gould-Helmville shows significant sign of impact to soil and vegetation. Gould-Helmville is located within excellent wild land habitat for elk, wolverine, lynx and grizzlies; the southern extent of known occupied grizzly habitat as well as cultural and historic resources on the Helena Divide. The proposed Decision fails to uphold the agency's responsibilities under EO 11644, as amended.

**Proposed Remedy: Adopt the provisions of Alternative #3 for the Nevada Mountain MA R-1 and Roadless Conservation Area with Gould-Helmville Trail 467.**

Alternative 3 improves on the Draft Decision in following ways:

1. Follows Forest Plan Goals, Objectives, and R-1 Management Area Standards.
2. Protects future non-motorized and wilderness potential pending consideration in forest plan revision, scheduled to begin next year.
3. Protects non-motorized and wilderness character.
4. Meets elk security standards for the herd units of this area.
5. Provides for wolverine, lynx, grizzly and other classified and human disturbance sensitive wildlife that rely on core wild lands of the Nevada Mountain Roadless Conservation Area.
6. Is consistent with EO 11644, as amended, National Forest Management Act and other laws governing National Forests.

**Objection 2: Management of the Continental Divide National Scenic Trail from Roger's Pass to the Scapegoat Wilderness.**

The proposed Decision permits bicycle use along the CDNST from Roger's Pass to the Scapegoat Wilderness. North of Roger's Pass, between Lewis and Clark Pass and the Scapegoat Wilderness, the CDNST traverses the common boundary of Helena and Lewis and Clark National Forests, entering the Falls Creek Recommended Wilderness Area. The Lewis and Clark National Forest Plan governs the Falls Creek Recommended Wilderness Area, a U S Forest Service recommended addition to the Scapegoat Wilderness.

The proposed Decision errs in failing to limit bicycle use on the CDNST between Lewis and Clark Pass and the Scapegoat Wilderness.

The Helena National Forest Plan (1986) provides forest wide management direction for the Continental Divide National Scenic Trail, directing that management of Continental Divide National Scenic Trail (CDNST) on Helena National Forest follow the national CDNST comprehensive plan. CDNST direction will be incorporated" in the forest plan, including a more detailed analysis showing CDNST trail and area travel objectives.

The national CDNST comprehensive plan was revised through a multi year public process, signed by Chief Tidwell and published in the Federal Register/ Forest Service Manual in October 2009. The Final revised Plan states:

The nature and purposes of the CDNST are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor. (FSM 2353.42)

The comprehensive plan also states that "CDNST plans" ... "will be prepared in conjunction with travel management..." and directs area management of surrounding national forest lands to meet CDT plan goals:

Where possible, the CDNST will be located in primitive and semi-primitive non-motorized settings, which will contribute to providing for maximum outdoor recreational potential and conservation of natural, historic and cultural resources in the area traversed by the CDNST.

FSM 2353.44(b)

For "Recreation Resource Management," the 2009 Continental Divide National Scenic Trail Comprehensive Plan provides the following direction for managing recreation uses on sections of the Continental Divide Trail: (2009 CDNST CP, page 15)

(1) Manage the CDNST to provide high-quality scenic, primitive hiking and pack and saddle stock opportunities. Backpacking, nature walking, day hiking, horseback riding, nature photography, mountain climbing, cross-country skiing, and snowshoeing are compatible with the nature and purposes of the CDNST.



(2) Bicycle use may be allowed on the CDNST (16 U.S.C. 1246(c)) if the use is consistent with the applicable land and resource management plan and will not substantially interfere with the nature and purposes of the CDNST.

The draft Decision does not propose to limit bicycles anywhere on the CDNST. Between Lewis and Clark Pass and the Scapegoat Wilderness, the CDNST follows the Continental Divide which forms a common boundary with the Lewis and Clark National Forest (LCNF), traversing into the Falls Creek Recommended Wilderness.

Under LCNF forest plan guidance, trails within the Falls Creek Recommended Wilderness are managed for foot and stock use only.

While we support shared bicycle use on much of the CDNST, mountain bike use on the CDNST between Lewis and Clark Pass and the Scapegoat Wilderness is not consistent with the Lewis and Clark National Forest Plan and the 2009 CDNST Comprehensive Plan. This oversight merits correction in the Final Decision.

The primary recreation purposes of the CDNST are for high quality hiking, horseback riding, backpacking, snowshoeing, skiing, etc. Allowance of motorized use on the CDNST is contrary to the purpose of its designation. Bicycle use (non-motorized) may be allowed on segments of the CDNST where bike use is consistent with the applicable land and resource management plan (forest plan) and does not conflict with the nature and purposes of the CDNST.

The Montana High Divide Trails agreement --uniquely signed and endorsed by 9 local organizations including three bike clubs and 2 backcountry horsemen/women—groups recommends that the CDT from Roger's Pass North, be managed for foot and stock travel only; while south of the pass, the CDT be managed for foot, stock and bicycle travel.

As a proposed remedy, we have significantly narrowed our specific request to allow foot and stock use only from Lewis and Clark Pass to the Scapegoat Wilderness; roughly 7.6 trail miles, leaving over 40 miles available for bicycle use.

**Proposed Remedy: Manage the CDNST from Lewis and Clark Pass to Scapegoat Wilderness for Foot and Stock Travel Only.** This travel plan is the right vehicle to establish where mountain bike use is appropriate on the CDNST, as directed by the 2009 CDNST Comprehensive Plan. Although MWA and MHDT prefer a foot and stock use only north of Roger's Pass, after extensive collaboration, MHDT and MWA will accept, and respectfully request foot and stock uses only on the CDNST from Lewis and Clark Pass North.

Incorporating the Proposed Remedy into the Final means that roughly 44 miles of the CDNST would be available for mountain bike use, while the northernmost 7.6 miles between Lewis and Clark Pass and the Scapegoat Wilderness would be managed for foot and stock use only. Foot and stock uses are the primary uses of this section of the CDT.

This remedy is practical, consistent with CDNST direction and endorsed by the Montana High Divide Trails Partnership.

The proposed remedy improves the Final Decision in the following ways:

1. Is consistent with Lewis and Clark National Forest Plan and Travel Plan.
2. Follows Recreation Management Direction of the 2009 Continental Divide National Scenic Trail Comprehensive Plan, as required in Helena Forest Plan.
3. Prevents potential conflicts and safety issues on traditional foot and pack stock trail sections that is also a wilderness portal trail.
4. Provides a balanced approach to use of CDNST endorsed by Montana High Divide Trails Partners including mountain bikers, equestrians and hikers.
5. Lewis and Clark Pass is a more practical, accessible and identifiable point on the CDNST than the draft proposal to make the transition from foot, stock and bicycles to foot and stock use.

**Objection 3: Limit Granite Butte Lookout access road to administrative uses only.**

Granite Butte Lookout access road should be limited to administrative uses, handicapped access and use of people renting the Granite Butte Lookout. The investment of time, energy, and materials in repairing the lookout will be better protected from potential vandalism, damage or pilferers. People renting the refurbished Granite Butte Lookout will have a higher quality experience at the lookout without casual vehicle traffic. The lookout is also located on the Continental Divide National Scenic Trail, a yearlong non-motorized trail. Limiting motorized access helps provide higher-quality experience for non-motorized trail users in this area. Limited vehicle access will also reduce resource damage from illegal cross-country vehicle driving into the surrounding mountain meadows. MWA and MHDt fully support access for those with limited abilities, which may be granted on a case-by-case basis by local line officers to offer recreational opportunities.

**Proposed Remedy: Gated access point at the junction of Marsh Creek Road and the Granite Butte Lookout access point (FS Road #4133).**

**Objection 4: Continental Divide Trail (north to Cellar Gulch) managed as non-motorized.**

The purpose of the CDNST as a non-motorized trail as well as the ecological significance of the area is discussed at length in this objection. Please incorporate all of the comments above in support of our objection to the CDNST from Cellar Gulch to Junction with Gould-Helmville Trail #467 to be managed for motorized use. This section of the CDNST proposed for motorized use is approximately .5 of a mile south of Cellar Gulch.

**Proposed Remedy: Manage the CDNST as non-motorized south of Cellar Gulch.**

### **Prior Substantive Comments**

All of the issues raised in this objection were also raised in our comments during scoping, proposed Alternative C submitted prior to the release of the draft environmental impact statement, and in response to the draft environmental impact statement.

Comments submitted during scoping on January 6, 2011 jointly by MWA and MHDTA address:

- Gould-Helmville and Nevada Mountain Roadless Area (pp. 10-12).
- Nevada Mountain Roadless Area as recommended wilderness (p. 12)
- Management of the CDNST including the section from Rodgers Pass (pp. 6-7) to the Scapegoat Wilderness.
- Proposed management for Gould Helmville and CDNST (p.12).

Comments submitted by MWA on January 7, 2011 address:

- Bicycle use of specific sections of the CDNST (p.6)
- The effect of travel management on forest planning. (p. 6)

MWA and Montana High Divide Trails also submitted an “Alternative C” or “Citizens Alternative” to Helena National Forest Supervisor Kevin Riordan and Lincoln District Ranger Amber Kamps on July 18, 2011 which also contained the recommendations discussed herein.

Montana High Divide Trails Unified Recommendations submitted on March 11, 2013 also indicated

- Support for Alternative #3 (pp. 5 and 10)
- Nevada Mountain Roadless Area (p. 11)

In response to the Draft Environmental Impact Assessment, on March 11, 2013, Montana High Divide Trails Association and MWA submitted comments discussing

- CDNST north of Rodger’s Pass (p. 7)
- Nevada Mountain Roadless Area (pp. 11-13).

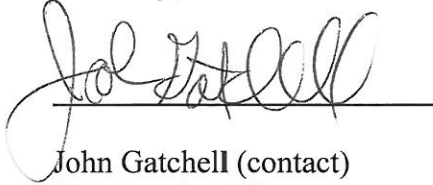
The remedies requested reflect the collaboration of a wide range of affected outdoor recreation organizations including those who use and help maintain the Continental Divide National Scenic Trail. These remedies crafted in the best interest of national forest management purpose and resources, will greatly improve the Final Record of Decision for the Blackfoot Travel Plan.

We look forward to partnering with the U S Forest Service to help build, maintain, improve public access and provide lasting stewardship of the Continental Divide National Scenic Trail and surrounding National Forest wild lands.

**Attachments:**

1. Helena Forest Plan Map (portion) showing R-1 Forest Plan Non-motorized area within Nevada Mountain.
2. Nevada Mountain Roadless Area, from Appendix C, 1986 Helena Forest Plan
3. Falls Creek Recommended Wilderness, from Lewis and Clark NF Plan
4. Map of Proposed Remedy for CDNST from Lewis and Clark Pass to the Scapegoat Wilderness

Sincerely,



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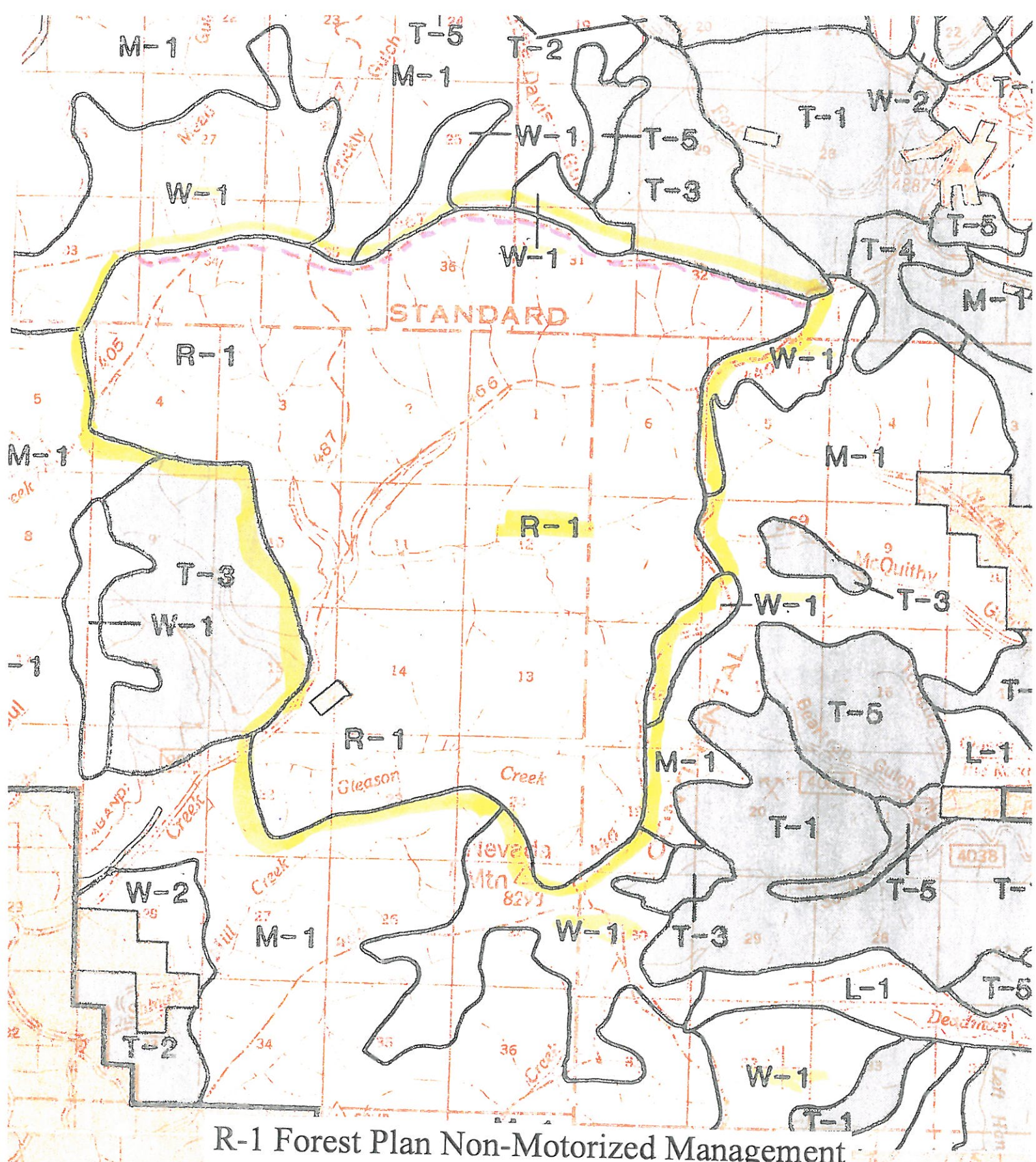
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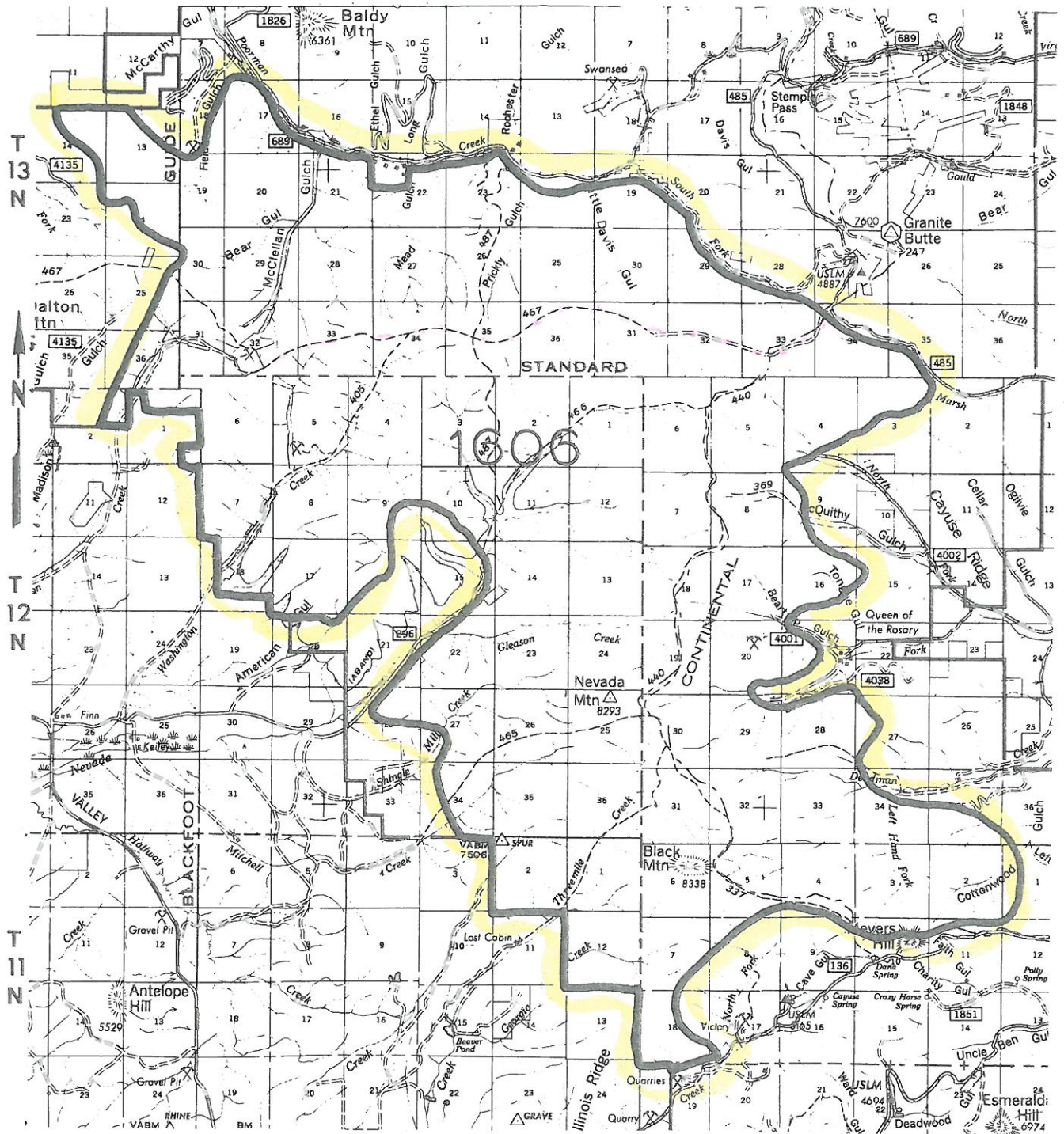


R-1 Forest Plan Non-Motorized Management Area within Nevada Mountain Roadless Conservation Area.

----- Trail #467 within R-1 Non-Motorized Management Area.  
 Source: Helena Forest Plan, April 1986



# NEVADA MOUNTAIN (1606)



## Nevada Mountain Roadless Conservation Area

Source: Appendix C, Helena Forest Plan, April 1986



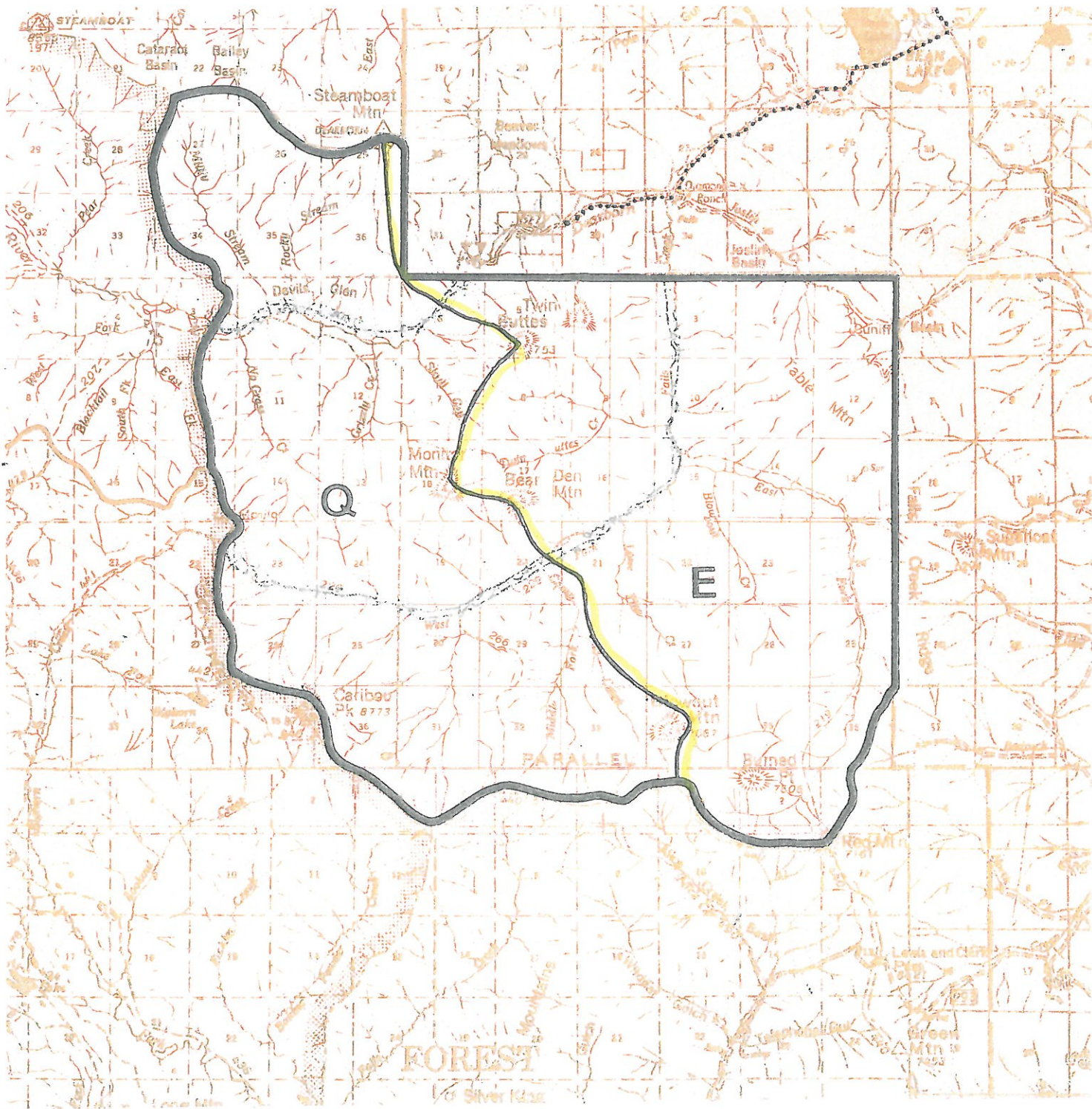
KM-9

Falls Creek

Geographic Unit

# Falls Creek Recommended Wilderness Management Area (MA Q)

Source: Lewis and Clark National Forest Plan. June 4, 1986





**Proposed Remedy - Objection #2**  
**Continental Divide National Scenic Trail**  
**Draft Record of Decision**  
**Blackfoot Travel Plan**

